



September 20, 2021

VIA ECF

Hon. Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Frey, et al. v. New York City, et al.*
21 Civ. 05334 (NSR)

Your Honor,

I represent the plaintiffs, Jason Frey, Brianna Frey, Jack Cheng, and William Sappe in the above-referenced matter.

I write to request permission to file an oversized reply memorandum of law in response to the defendants' opposition to Plaintiffs' motion for a preliminary injunction. The return date for Plaintiffs' motion is tomorrow, September 21, 2021. Counsel has indicated their consent to Plaintiffs' request.

As the Court may recall, the State defendant was granted an additional 20 pages for his opposition brief, which was on consent as well.

Plaintiff is requesting an additional 10 pages for their reply brief. This request is based on the length of space required to respond to the State's arguments regarding standing, which has left very little space to reply to the arguments concerning the substance of Plaintiffs' motion for injunctive relief.

Thank you for the Court's consideration.

Sincerely,

/s
Amy L. Bellantoni

cc: Ian Ramage, Esq.
NYS Attorney General's Office (via ECF)

NYC Law Department (via ECF)